

PETER SULLIVAN, SBN 101428
PSullivan@gibsondunn.com
SAMUEL G. LIVERSIDGE, SBN 180578
SLiversidge@gibsondunn.com
MICHAEL H. DORE, SBN 227442
MDore@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
333 South Grand Avenue
Los Angeles, California 90071-3197
Telephone: (213) 229-7000
Facsimile: (213) 229-7520

Attorneys for Defendant
HEWLETT-PACKARD COMPANY

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

JACKIE BLENNIS and DAVID BRICKNER,
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

HEWLETT-PACKARD COMPANY, a
California Corporation; and DOES 1 through
250, inclusive,

Defendants.

CASE NO. C 07 00333-JF

**JOINT STIPULATION AND [PROPOSED]
ORDER CONTINUING CASE
MANAGEMENT CONFERENCE;
SUPPORTING DECLARATIONS OF
ALFREDO TORRIJOS AND MICHAEL H.
DORE**

[N.D. Cal. Local Rule 6-1(b) & 6-2]

[PROPOSED]

CONFERENCE DATE: March 14, 2008

CONFERENCE TIME: 9:00 a.m.

1 **JOINT STIPULATION**

2 WHEREAS Plaintiffs Jackie Blennis and David Brickner ("Plaintiffs") commenced this
3 action by filing a Complaint on January 17, 2007, and serving the Complaint on Defendant Hewlett-
4 Packard Company ("Defendant") on May 1, 2007;

5 WHEREAS on November 2, 2007, the Court held a hearing on Defendant's Motion to
6 Dismiss and continued the scheduled case management conference to January 18, 2008 at 10:30 a.m.;

7 WHEREAS good cause exists for approving this Joint Stipulation, because, as explained in
8 the accompanying declarations of Alfredo Torrijos and Michael H. Dore, continuing these deadlines
9 would further judicial economy by presumably allowing the parties to address the topics specified in
10 the Federal Rules of Civil Procedure and Local Rules subsequent to the Court's ruling on
11 Defendant's Motion to Dismiss, thus enabling the parties to have a better sense of the scope of the
12 case.

13 ACCORDINGLY, pursuant to Local Rule 6-1(b), the parties, by and through their counsel of
14 record, hereby stipulate to, and request the Court's approval of the following:

- 15 1. The Case Management Conference shall be moved from January 18, 2008, to
16 **March 14, 2008**, at 9:00 a.m. (or such other date when the Court is available).
17 2. All other deadlines remain as scheduled by the Court and/or pursuant to the
18 Federal Rules of Civil Procedure and/or the Court's Local Rules

19 **IT IS SO STIPULATED.**

20 DATED: January 8, 2008

KABATECK BROWN KELLNER LLP
BRIAN S. KABATECK
RICHARD L. KELLNER
ALFREDO TORRIJOS

21 By: 

Alfredo Torrijos

22 Attorneys for Plaintiffs JACKIE BLENNIS and DAVID
23 BRICKNER

1 DATED: January __, 2008

GIBSON, DUNN & CRUTCHER LLP
PETER SULLIVAN
SAMUEL G. LIVERSIDGE
MICHAEL H. DORE

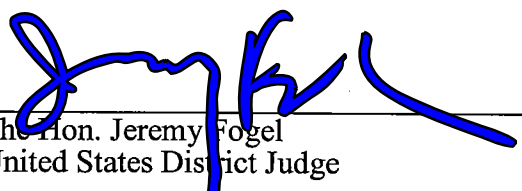
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4 By: 

5 Michael H. Dore

6 Attorneys for Defendant HEWLETT-PACKARD
7 COMPANY

8
9 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

10 Dated: 1/14/08, 2008

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13 The Hon. Jeremy Fogel
United States District Judge

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1. I am an attorney admitted to practice law before all courts of the State of California. I am an associate in the law firm of Kabateck Brown Kellner LLP, and I am one of the attorneys responsible for the representation of Plaintiffs Jackie Blennis and David Brickner ("Plaintiffs") in the action entitled *Jackie Blennis and David Brickner, et al. v. Hewlett-Packard Company, et al.* (N.D. Cal. Case No. C 07-00333-RMW). Pursuant to Local Rule 6-2(a), I submit this declaration in support of the parties' Joint Stipulation and [Proposed] Order Continuing Case Management Conference (the "Joint Stipulation"). Unless otherwise stated, the following facts are within my personal knowledge and, if called and sworn as a witness, I could and would testify competently thereto.

3. The Reasons for the Requested Enlargement or Shortening of Time (Local Rule 6-2(a)(1)). I believe that judicial efficiency would best be served by holding the case management conference subsequent to the Court's ruling on Defendant's motion to dismiss, which would allow the parties to have a better sense of the scope of the case when attempting to address the various topics and deadlines raised in the Federal Rules of Civil Procedure and this Court's Local Rules.

5. Effect of the Requested Time Modification on the Schedule for the Case (Local Rule 6-2(a)(3)). The requested extensions in the Joint Stipulation would move the scheduled Case Management Conference from January 18, 2008, to March 14, 2008. As a result, this would also alter the following deadlines:

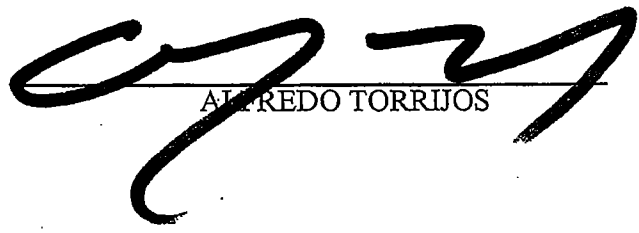
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(a) Last day to file Subsequent Case Management Statement per Local Rule 16-10(d):
from January 8 to **March 4, 2008**.

6. At this early stage of the proceeding, it is premature to predict whether the continuance requested by the parties would have any impact on additional pretrial deadlines.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: January **8**, 2008



ALFREDO TORRIJOS